

Samuel O. Ogbogu, Esq. (SB# 156427)  
SAMUEL OGBOGU, INC.  
4311 Wilshire Boulevard Suite 308  
Los Angeles, Ca 90010  
Telephone: (213) 624-1500  
Facsimile: (323) 433-7330  
Email: [sogboguinclaw@aol.com](mailto:sogboguinclaw@aol.com)

Jay Valentine, Esq. (SB# 302534)  
Valentine Law  
827 State Street, Suite 19  
Santa Barbara, CA 93101  
Telephone: (805)-455-7427  
Email: [valentinelaw805@gmail.com](mailto:valentinelaw805@gmail.com)

Attorneys for Plaintiff, Nathalie Cohen

**UNITED STATES DISTRICT COURT**  
**FOR THE CENTRAL DISTRICT OF CALIFORNIA**

NATHALIE COHEN,

Plaintiff,

Vs.

THE UNITED STATES

Defendant.

CASE NO: 2:23-cv-07757

**COMPLAINT FOR DAMAGES:**

**1. Negligence**

**PLAINTIFF'S ORIGINAL COMPLAINT**

COMES NOW Plaintiff, NATHALIE COHEN, and files the herein Plaintiffs' Original  
Complaint complaining of The United States, hereinafter sometimes referred to as "Defendant"  
and would respectfully show the Court the following:

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COMPLAINT FOR DAMAGES

I.

**PARTIES, JURISDICTION, SERVICE OF PROCESS, AND VENUE**

1. This is an action for personal injuries brought by Plaintiff, Nathalie Cohen.

2. The Defendant is the United States.

3. This Federal District Court has jurisdiction of this cause, because this action is brought pursuant to and in compliance with 28 U.S.C §§1346(b), 2671-2680 *et seq.*, commonly known as the “Federal Tort Claims Act”, which vests exclusive subject matter jurisdiction of Federal Tort Claims litigation in the Federal District Court.

4. The United States may be served with process in accordance with Rule 4(I) of the Federal Rules of Civil Procedure, by delivering a copy of the summons and of the complaint to the United States attorney for the district in which the action is brought or to an assistant United States attorney or clerical employee designated by the United States attorney in a writing filed with the clerk of the court or by sending a copy of the summons and of the complaint by registered or certified mail addressed to the civil process clerk at the office of the United States attorney, Central District of California, 300 North Los Angeles Street Suite 7516, Los Angeles, California 90012; and by also sending a copy of the summons and of the complaint by registered or certified mail to the Attorney General of the United States at Washington, District of Columbia.

5. Venue is proper in this district pursuant to 28 U.S.C. § 1391(e), as the United States is a Defendant and a substantial part of the events or omissions giving rise to the claim occurred in this district, and specifically located at Vandenberg Space force Base (VSFB), 706 Washington Avenue, VSFB, CA 93437.

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1 pass at the Santa Maria entrance gate. Upon clearing security, she is passed through and she will  
2 drive a distance of approximately a mile to get to her place of work in the base.

3 14. The Santa Maria entrance gate always has no less than two security personnel at all times.  
4  
5 The security personnel at the gate have, among other functions, the ability to activate  
6  
7 the AVB to block further ingress into the base. Once activated, the barrier rises from the road  
8 surface and blocks any further ingress into the base.

9  
10 15. After presenting her base pass, and after she was cleared to drive into the base,  
11 Plaintiff proceeded to drive into the base. She was traveling within the speed limit. As she  
12 travelled about 100 -200 yards into the base and without any warning from any source, the steel  
13 barrier was suddenly deployed, and suddenly popped up from the ground and in front of the  
14 plaintiff.

15  
16 16. Plaintiff had no way of avoiding the immediate impact that occurred. The result  
17 was a vicious collision involving the 2002 Chevy Tahoe, owned and operated by plaintiff, and  
18 the steel barrier installed by The Department of Air Force, and operated by agents and or  
19 employees of the defendant.

20  
21 17. As a proximate result of the defendants conduct and the ensuing collision,  
22 Plaintiff sustained serious injuries, including fibula and rib fractures, multiple lacerations,  
23 contusions and bruises, all in an amount in excess of \$75,000.00.

24 **VII.**

25 **FIRST CAUSE OF ACTION FOR NEGLIGENCE AGAINST THE UNITED STATES**

26  
27 18. Plaintiff re-alleges and incorporates by reference each and every allegation  
28 contained in paragraphs 1 through 17, as though set forth herein in full.





**XII**

**DEMAND FOR JURY TRIAL**

Plaintiff demand jury trial on all issues.

Respectfully submitted,

By: /s/ Samuel Ogbogu  
SAMUEL O. OGBOGU  
State Bar No. 156427  
Attorneys for Plaintiff,  
Nathalie Cohen